

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO
POSTAL SERVICE WITNESS MARTIN

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatories to Postal Service witness Martin GCA/USPS-T6-1 to - 6

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media).

January 27, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T6-1

Please refer to page 9, lines 11-23, of your prefiled testimony, and to the first page of Library Reference USPS-N2012-1/11 ("Plant to Plant Transportation Summary").

(a) Was the 24.71 percent reduction reported in both the above-cited locations arrived at by averaging the unrounded percent reductions in the last column of the above-cited spreadsheet? If your answer is not an unqualified "yes," please fully explain how the 24.71 percent was arrived at.

(b) Please explain how, if at all, route miles, annual frequency of trips, utilization, and vehicle capacity entered into the derivation of the 24.71 percent reduction.

(b) Please confirm that the 1,723 total trips shown as the total of the second column are identical with the trips listed in the second spreadsheet of Library Reference USPS-N2012-1/11 ("Plant to Plant Trips"). If you do not confirm, please explain fully.

GCA/USPS-T6-2

Please refer again to page 9, lines 11-23, of your prefiled testimony, and to the second spreadsheet of Library Reference USPS-N2012-1/11 ("Plant to Plant Trips").

(a) Does each of the HCR ID numbers in the second column represent a single, distinct highway contract transportation contract? If your answer is not an unqualified "yes," please explain fully (i) what an HCR ID number does represent, and (ii) how, if at all, a user of this spreadsheet and/or your testimony and sup-

porting materials as a whole can associate an HCR ID number, and/or a trip or group of trips, with a particular contract.

(b) (i) If it is possible to associate an HCR ID number, and/or a trip or group of trips, with a particular contract, please explain fully how, if at all, a user of this spreadsheet and/or your testimony and supporting materials as a whole can determine to which of the contract types listed on page 4 of your prefilled testimony, lines 9-17, each such contract belongs.

(ii) If you have workpapers or other preliminary materials which would provide the information described in (b)(i), please provide them.

(c)(i) If it is not possible to associate an HCR ID number, and/or a trip or group of trips, with a particular contract, please explain fully how, if at all, a user of this spreadsheet and/or your testimony and supporting materials as a whole can associate an HCR ID number, and/or a trip or group of trips, with one of the contract types referred to in (b)(i).

(ii) If you have workpapers or other preliminary materials which would provide the information described in (c)(i), please provide them.

GCA/USPS-T6-3

Please refer to page 9 of your prefilled testimony at lines 17-19.

Does the expression "our current service standards" in line 18 refer exclusively to First-Class Mail standards? If your answer is not an unqualified "yes," please specify all service standards which are referred to.

GCA/USPS-T6-4

Please refer to your prefiled testimony at page 9, lines 19-21, and page 12, lines 21-23.

(a) Please explain fully why the 24.71 percent reduction cited on page 9 is described as a reduction in "plant-to-plant transportation" and the 13.68 percent reduction cited on page 12 as a reduction in "operating miles."

(b) If the two expressions quoted in (a) are not equivalent, please explain fully how, if at all, they can be made commensurable with one another.

GCA/USPS-T6-5

Please refer to Figures 3 and 4, on pages 10 and 11 of your prefiled testimony.

(a) Are these Figures intended to show a change in the number of routes and/or the total route miles, without regard to the number of trips per day (or other period) required over each such route? Please explain fully.

(b) Would it be correct to interpret these Figures to mean that the post-rationalization configuration of routes shown in Figure 4 for plant A and its original five post offices was not also used for the pre-rationalization plant A in Figure 3 *solely* because of trip length or trip time restrictions imposed by current service standards? Please fully explain either an affirmative or a negative answer.

Please refer to your prefiled testimony at page 12, line 23, through the end of page 13.

(a) You state that “[t]he facility-specific AMP process will ultimately determine the reductions that will occur as a result of the respective plant consolidations expected to be implemented.” Should this sentence be interpreted to mean that the reductions will depend, wholly or in part, on how many plant consolidations are implemented, by comparison with the total number of consolidations listed for consideration? Please explain fully.

(b) Would the number of PVS sites ultimately closed (page 13, lines 9-10) depend on the outcome of facility-specific AMP processes, in the same manner as reflected in your response to (a)? Please explain fully.